## SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

ONE MANHATTAN WEST NEW YORK, NY 10001

> TEL: (2 | 2) 735-3000 FAX: (2 | 2) 735-2000 www.skadden.com

DIRECT DIAL
2 | 2-735-4 | 32
DIRECT FAX
9 | 7-777-4 | 32
EMAIL ADDRESS
SUSAN.SALTZSTEIN@SKADDEN.COM

BOSTON
CHICAGO
HOUSTON
LOS ANGELES
PALO ALTO
WASHINGTON, D.C.
WILMINGTON

FIRM/AFFILIATE OFFICES

BEIJING BRUSSELS FRANKFURT HONG KONG LONDON MOSCOW MUNICH PARIS SÃO PAULO SEOUL SHANGHAI SINGAPORE TOKYO

TORONTO

June 7, 2021

## **BY ECF**

Hon. Katharine H. Parker United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007 USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:\_
DATE FILED: 6/9/2021

RE: In re Lifetrade Litigation; 17-cv-02987 (JPO) (KHP); Motion to Seal

Equity Trust's Opposition to Plaintiffs' Motion to Amend

Dear Judge Parker:

We represent Defendant TMF Curação N.V. ("Equity Trust") in the referenced action. Pursuant to Paragraph III(d) of Your Honor's Individual Practices in Civil Cases, we respectfully seek leave to file under seal Equity Trust's Memorandum of Law in Opposition to Plaintiffs' Motion to Amend, which responds to papers that Plaintiffs have sought leave to file under seal.

By way of background, Plaintiffs filed a Motion to Amend on May 21, 2021. (ECF 436.) Plaintiffs have sought permission to file the papers supporting that motion (ECF 437, 438) under seal on the ground that they reference or constitute other parties' discovery materials that had been designated as confidential. (ECF 435.) While Equity Trust takes no position on the propriety of Plaintiffs' sealing request, out of an abundance, Equity Trust seeks to file its opposition brief under seal as it references, describes, summarizes and responds to the same documents at issue in Plaintiffs' moving papers.

Respectfully submitted,

/s/ Susan L. Saltzstein

Susan L. Saltzstein

APPLICATION GRANTED

Hon. Katharine H. Parker, U.S.M.J.

Date: June 9, 2021

cc: All counsel of record (by ECF)